

NVB 2016 (05/2022)

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

**Fee Application Cover Sheet**

Case No.: 21-14486-abl Chapter: 7 Hearing Date/Time: 12/1/2022 11:00Debtor: INFINITY CAPITAL MANAGEMENT, INC. dba INFINITY HEALTH CONNECTIONSApplicant: Atkinson Law AssociatesDate of Employment: 9/28/2021Interim Fee Application No: \_\_\_\_\_ OR Final Fee Application 1**Amounts Requested:**Client Approval: Yes ☒ No ☐Fees: \$ 29,074.00Expenses: \$ 1,663.59Total: \$ 30,737.59Hours: 76.30Blended Rate: \$ 381.05Fees Previously Requested: \$ 0.00Awarded: \$ 0.00Expenses Previously Requested: \$ 0.00Awarded: \$ 0.00Total Previously Requested: \$ 0.00Awarded: \$ 0.00Total Amount Paid: \$ 0.00**Chapter 13 Cases ONLY:**Yes ☐ No ☐ Elected to accept the Chapter 13 Presumptive Fee pursuant to LR 2016.2, and filed the "Notice of Election to Accept the Presumptive Fee" on \_\_\_\_\_.Yes ☐ No ☐ Participated in the Mortgage Mediation Program: If yes, amount received: \$ \_\_\_\_\_

I certify under penalty of perjury that the above is true.



Signature

Date 10/21/2022

**ROBERT E. ATKINSON**  
CHAPTER 7 BANKRUPTCY TRUSTEE  
376 E. Warm Springs Rd Suite 130  
Las Vegas, NV 89119  
Telephone: (702) 617-3200  
Email: Robert@ch7.vegas

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEVADA**

In re:

INFINITY CAPITAL MANAGEMENT, INC.  
*dba* INFINITY HEALTH CONNECTIONS,

Debtor.

Case No. 21-14486-abl  
Chapter 7

**FIRST AND FINAL APPLICATION OF ATKINSON LAW ASSOCIATES LTD. FOR  
COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED WHILE  
GENERAL COUNSEL FOR THE TRUSTEE**

Atkinson Law Associates Ltd. (“*ALA*”) hereby submits this first and final application for compensation and reimbursement of expenses (collectively, the “*Application*” or “*Application for Compensation*”) incurred while ALA was employed as general counsel to Robert E.

Atkinson (“*Trustee*”), the chapter 7 trustee for the above-captioned bankruptcy estate.

This Application for Compensation is made pursuant to: 11 U.S.C. §§ 330(a), 507(a)(1)(C), and 503(b)(2); Fed. R. Bankr. P. Rule 2016; Local Rule 2016; Section 2 of the Guidelines of the U.S. Department of Justice, Office of the United States Trustee—Region 17 (“*R17 Guidelines*”) and the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 adopted by the Executive Office for United States Trustees pursuant to 28 U.S.C. § 586(a)(3)(A) (“*EOUST Guidelines*”) (collectively, the “*Guidelines*”); and the pleadings and papers on file in this case, judicial notice of which is hereby requested. This Application for Compensation is also supported by the accompanying Client Review Statement (attached herewith as **Exhibit 6**), and the contemporaneously-filed Declaration of Robert Atkinson, Esq. (“*Atkinson Decl.*”).

## **I. INFORMATION ABOUT APPLICANT & APPLICATION FOR COMPENSATION**

In support of this Application for Compensation, ALA respectfully represents the following, which is structured in a manner consistent with the Section (b) of the EOUST Guidelines.

Date the bankruptcy petition was filed. INFINITY CAPITAL MANAGEMENT, INC. dba INFINITY HEALTH CONNECTIONS (“Debtor”) filed a chapter 7 bankruptcy petition on September 14, 2021. [DE #1.]

1. **Date of the order approving employment.** On September 28, 2021, the Trustee filed an application [DE #37] to employ ALA as his general counsel. An order authorizing such employment (effective as of the filing date of the application), was docketed on November 8, 2021 [DE #122].

2. **Identity of the party represented.** ALA represents Robert E. Atkinson, the current chapter 7 trustee for the Debtor’s bankruptcy estate.

3. **Date services commenced.** ALA commenced representing the Trustee on September 28, 2021. [DE #37.]

4. **Whether the applicant is seeking compensation under a provision of the Bankruptcy Code other than section 330.** No.

5. **Terms and conditions of employment and compensation.** Per the engagement letter attached as an exhibit to the application for employment (“Engagement Letter”), legal services provided by ALA to the Trustee are charged at normal hourly rates for that calendar year. Fees are billed in 0.1 hour (6-minute) increments. Expenses are billed at cost. These terms have previously been approved in this case as being reasonable under 11 U.S.C. § 328. [DE #122.] All professional services for which compensation is requested were performed for or on behalf of the Trustee, and not on behalf of any other person. There is no agreement or understanding regarding the sharing of compensation between ALA and any other person.

6. **Source of compensation.** All compensation and expenses sought in this Application are requested to be allowed as an administrative expense of the bankruptcy estate and shall be paid from the general funds of the estate.

7. **Existence and terms controlling use of a retainer.** Not applicable.

8. **Any budget caps or other limitations on fees.** No.

9. **Names and hourly rates of all applicant's professionals and paraprofessionals who billed time.** The following persons billed time during this application period:

| <u>Person</u>             | <u>2021 Rate</u> | <u>2022 Rate</u> |
|---------------------------|------------------|------------------|
| Clarisse Crisostomo, Esq. | \$380/hr         | \$420/hr         |
| Paralegals                | \$180/hr         | \$180/hr         |

10. **Explanation of any changes in hourly rates from those previously charged.**  
Not applicable.

11. **Statement of whether the compensation is based on the customary compensation charged by comparably skilled practitioners in cases other than cases under title 11.** The fees charged by ALA in this case are the normal hourly rates charged by ALA in 2021 and 2022.

12. **Whether the application is interim or final.** This is a final application.

13. **Dates of previous orders on interim compensation or reimbursement of expenses along with the amounts requested and the amounts allowed or disallowed, amounts of all previous payments, and amount of any allowed fees and expenses remaining unpaid.** Not applicable; this is the first and final application for compensation.

14. **Time period of the services or expenses covered by the application.** From September 28, 2021 through October 17, 2022, inclusively, and also including future time (whose date column is labeled 'TBD' in Exhibits 4 and 5) associated with the adjudication of the Application itself (collectively, the "Application Period").

## **II. CASE STATUS**

15. On September 14, 2021 ("Petition Date"), Debtor filed a voluntary petition for chapter 7 bankruptcy relief in this district, commencing this case. [DE #1.]

1           16. Also on September 14, 2021, Robert E. Atkinson was appointed as chapter 7  
2 trustee of this bankruptcy case. [DE #2.]

3           17. On September 28, 2021, the Trustee filed<sup>1</sup> an application [DE #37] to employ  
4 ALA as his general counsel, to assist in his investigation of the financial affairs of the Debtor,  
5 and in the liquidation of assets. The application was unopposed, and an order authorizing  
6 such employment (effective as of the filing date of the application), was docketed on  
7 November 8, 2021 [DE #122].

8           18. On October 5, 2021 the Trustee filed a joint motion to reject the debtor's sub-  
9 advisory agreement with Tecumseh [DE #61]. This motion was unopposed, and an order  
10 granting the motion was docketed on November 18, 2021 [DE #134].

11           19. Also on October 5, 2021 Tecumseh filed a motion to abandon certain  
12 receivables [DE #57]. The Trustee filed an opposition to that motion [DE #117], as did  
13 creditor HASelect [DE #118], to which Tecumseh filed a reply [DE #125]. On November 19,  
14 2021 an order was docketed denying the motion [DE #133].

15           20. On October 19, 2021, creditor HASelect filed an adversary proceeding against  
16 creditor Tecumseh, relating to various medical receivables [adversary case no. 21-01167] (the  
17 "HASelect AP"). On November 19, 2021, Tecumseh filed its answer, and included a  
18 counterclaim against HASelect and also the Trustee (on behalf of the estate). On January 7,  
19 2022, the Trustee filed his answer, and added a counterclaim against Tecumseh.

20           21. On November 2, 2021 the Trustee filed an adversary proceeding against  
21 Kabbage, Inc [Adv. No. 21-01212], seeking avoidance and recovery of a post-petition transfer  
22 in the amount of \$9,056.09. Kabbage promptly paid that amount to resolve the case, and the  
23 adversary case was dismissed.

24           22. On November 18, 2021 the Trustee filed a motion to approve settlement  
25 between the estate and the debtor's principals Oliver Hemmers and Anne Pantelas resolving a  
26 dispute as to the ownership of two vehicles [DE #128]. This motion was unopposed and an  
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28 <sup>1</sup> Unless otherwise indicated, all actions taken by the Trustee in this Case Status section after  
this date are by and through counsel.

1 order granting the motion was docketed on December 17, 2022 [DE #160]. That resolution  
2 resulted in \$10,285.00 being paid to the bankruptcy estate.

3 23. On December 3, 2021, the Trustee filed a motion [DE #145] to sell various  
4 assets of the estate to HASelect, including the estate's counterclaim against Tecumseh in the  
5 adversary case, and to set a sale date and sale procedures. Tecumseh filed an opposition to  
6 this motion [DE #155], to which the trustee replied [DE #163]. An order mostly approving  
7 the motion to sell was docketed on January 21, 2022 [DE #175]. The sale was held via an  
8 auction held by the Court on February 8, 2022. An order approving the sale to HASelect was  
9 docketed on February 11, 2022 [DE #184]. The sale resulted in \$100,000 in new money to  
10 the estate.

11 24. On February 28, 2022, the Trustee filed a motion in the HASelect AP to  
12 substitute in HASelect in the place and stead of the Trustee. Tecumseh filed a limited  
13 opposition to this motion, to which the Trustee filed a reply. An order approving this motion  
14 was docketed in the HASelect AP on May 23, 2022. As a result of this order, the Trustee is  
15 no longer a party to that adversary case.

16 25. The Trustee has liquidated a net total of \$151,588.60 in this case. No other  
17 adversary proceedings are anticipated to be filed.

### 18 **III. SUMMARY SHEET AND INVOICE**

19 26. The summary sheet is presented in Exhibit 1.

20 27. A summary invoice is presented in Exhibit 2.

### 21 **IV. PROJECT BILLING**

22 28. ALA maintained electronic records of time expended by its attorney and  
23 paralegal in rendering professional services to the Trustee, entries of which were made  
24 substantially contemporaneously with the rendition of those services. Atkinson Decl. at ¶ 5.

25 29. To ensure appropriate monitoring of ongoing services and to otherwise  
26 maintain appropriate accounting in compliance with the Guidelines, ALA allocated time  
27 expended to certain project billing categories, as defined in Exhibit 3.  
28

30. Included in Exhibit 3 is a narrative description of the services rendered in this case by each billing category, including: (i) an explanation of the duties undertaken, (ii) the necessity or benefit of the services rendered, and (iii) the results obtained or anticipated (and, where appropriate, the outcome had the particular services not been performed).

31. *Fees:* Time and service entries reported in chronological order under the appropriate project category are presented in **Exhibit 4**. All of the time entries contained in Exhibit 4 accurately reflects the professional services performed by ALA on behalf of the Trustee during the Application Period in this bankruptcy case. [*Atkinson Decl.* at ¶ 6.] The time spent by ALA during the Application Period was for work reasonably likely and necessary for the benefit of the bankruptcy estate at the time they were incurred, and necessary for the administration of the bankruptcy estate. [*Id.* at ¶ 8; Exhibit 6 (Client Review Statement) at ¶ 5.]

32. As shown in Exhibit 4, the time spent by task, and corresponding fees incurred, were:

| Code | Task                        | Attorney Hours | Paralegal Hours | Total Fees Incurred |
|------|-----------------------------|----------------|-----------------|---------------------|
| AAR  | Asset Analysis & Recovery   | 49.4           | 3.5             | 20,734.00           |
| AD   | Asset Disposition           | 19.4           | .7              | 7,538.00            |
| FEA  | Fee/Employment Applications |                | .23             | 414.00              |
| CAO  | Claims Admin & Objections   | 1.0            | 0               | 388.00              |

**Total Fees Incurred    \$29,074.00**

33. *Expenses:* ALA incurred actual and necessary expenses in the aggregate amount of \$1,663.59 in the delivery and performance of professional services to the Trustee during the Application Period. Expenses by category are presented in **Exhibit 5**. All of the expenses contained in Exhibit 5 of the Application are accurate and were incurred by ALA on behalf of the Trustee during the Application Period in this bankruptcy case. Postage and third-party costs are billed at actual. Per the Engagement Letter, photocopies are billed at \$0.25/page. [*Atkinson Decl.* at ¶ 8.] The expenses incurred by ALA during the Application

Period was for work reasonably likely and necessary for the benefit of the bankruptcy estate at the time they were incurred, and necessary for the administration of the bankruptcy estate.

[Id. at ¶ 9; Exhibit 6 (Client Review Statement) at ¶ 5.]

**V. REQUESTED RELIEF**

34. That pursuant to the factors specified in 11 U.S.C. § 330(a)(3), the Court determines that the time and expenses shown in Exhibits 1, 4, and 5 spent by ALA on behalf of the Trustee are reasonable.

35. That pursuant to 11 U.S.C. §§ 330(a)(1) and 503(b)(2), ALA be awarded an administrative expense in this bankruptcy case, on a final basis, in the amounts of \$29,074.00 for fee compensation for professional services rendered plus \$1,663.59 for reimbursement of costs and expenses, for a total of \$30,737.59.

36. That the above amounts be payable from the Debtor's bankruptcy estate by the Trustee without further order of this Court required.

**VI. REVIEW AND APPROVAL**

37. The Trustee has reviewed this Application for Compensation and its exhibits, and has signed a statement approving the requested amount. *See* Exhibit 6.

38. Prior to filing, this Application for Compensation was not reviewed by an attorney from the Office of the U.S. Trustee.

# # #

**WHEREFORE**, the Trustee and applicant Atkinson Law Associates Ltd. respectfully requests that this Honorable Court grant the relief requested herein.

Respectfully submitted on: October 21, 2022

By: /s/ Robert E. Atkinson  
ROBERT E. ATKINSON  
CHAPTER 7 BANKRUPTCY TRUSTEE



## **EXHIBIT 1**

**SUMMARY SHEET****In re:**

INFINITY CAPITAL MANAGEMENT, INC.  
*dba* INFINITY HEALTH CONNECTIONS  
 Debtor.

**Chapter 7****Case No.**  
21-14486

|                           |    |   |                                 |
|---------------------------|----|---|---------------------------------|
| Fees Previously Requested | \$ | - | <b><u>NAME OF APPLICANT</u></b> |
| Fees Previously Awarded   | \$ | - | Atkinson Law Associates Ltd.    |

|                               |    |   |
|-------------------------------|----|---|
| Expenses Previously Requested | \$ | - |
| Expenses Previously Awarded   | \$ | - |

|                             |    |   |  |
|-----------------------------|----|---|--|
| Security Retainer Available | \$ | - | <b><u>ROLE IN THE CASE</u></b><br>Attorney for Trustee |
|-----------------------------|----|---|--|

**CURRENT APPLICATION:**

|                                      |           |                               |
|--------------------------------------|-----------|-------------------------------|
| Fees Requested                       | \$        | 29,074.00                     |
| Expenses Requested                   | \$        | 1,663.59                      |
| <b>Total Sought This Application</b> | <b>\$</b> | <b>30,737.59</b> <i>Total</i> |

**FEE APPLICATION DETAIL BY PERSON:**

| <i>Name</i> | <i>Hours Billed</i> | <i>Rate</i> | <i>Total for Application</i> |
|-------------|---------------------|-------------|------------------------------|
|-------------|---------------------|-------------|------------------------------|

**ATTORNEYS**

|                                  |             |               |                                     |
|----------------------------------|-------------|---------------|-------------------------------------|
| Clarisse Crisostomo - 2021 rates | 35.3 hours  | \$ 380.00 /hr | \$ 13,414.00                        |
| Clarisse Crisostomo - 2022 rates | 34.5 hours  | \$ 420.00 /hr | \$ 14,490.00                        |
| <i>Subtotal</i>                  | <u>69.8</u> |               | <i>Subtotal</i> <u>\$ 27,904.00</u> |

**BLENDDED HOURLY RATE FOR ATTORNEYS** \$ 399.77**PARALEGALS**

|                 |            |               |                                    |
|-----------------|------------|---------------|------------------------------------|
| Sierra Beasley  | 6.5 hours  | \$ 180.00 /hr | \$ 1,170.00                        |
| <i>Subtotal</i> | <u>6.5</u> |               | <i>Subtotal</i> <u>\$ 1,170.00</u> |

**BLENDDED HOURLY RATE FOR PARALEGALS** \$ 180.00

|             |                         |                                |
|-------------|-------------------------|--------------------------------|
| GRAND TOTAL | <u>76.3</u> Total Hours | <u>\$ 29,074.00</u> Total Fees |
|-------------|-------------------------|--------------------------------|

**TOTAL AVERAGE BLENDDED HOURLY RATE** \$ 381.05  
*(blendded attorney and paralegal)*

## **EXHIBIT 2**

## Invoice

**Atkinson Law Associates Ltd.**

376 E. Warm Springs Rd Suite 130  
 Las Vegas, NV 89119  
 ph: (702) 614-0600

**BILL TO:**

Robert E. Atkinson, Trustee  
 376 E. Warm Springs Rd. Ste 130  
 Las Vegas, NV 89119

**CASE**

*In re: INFINITY CAPITAL MANAGEMENT, INC.*  
*dba INFINITY HEALTH CONNECTIONS*  
 21-14486

**INVOICE FOR PERIOD**

September 28, 2021 through October 17, 2022

**INVOICE DATE**

10/17/22

**Fees for Services Rendered:**

| DESCRIPTION                            | QUANTITY   | BILLING RATE | AMOUNT             |
|--|------------|--------------|--------------------|
| Clarisse Crisostomo, Esq. - 2021 rates | 35.3 hours | \$380 / hour | \$13,414.00        |
| Clarisse Crisostomo, Esq. - 2022 rates | 34.5 hours | \$420 / hour | \$14,490.00        |
| Paralegal Fees                         | 6.5 hours  | \$180 / hour | \$1,170.00         |
| <b>Subtotal Fees</b>                   |            |              | <b>\$29,074.00</b> |

**Expenses:**

| DESCRIPTION              | RATE               | AMOUNT            |
|--------------------------|--------------------|-------------------|
| Printing                 | Actual / no markup | \$21.50           |
| Postage                  | Actual / no markup | \$9.87            |
| Third-Party Costs        | Actual / no markup | \$1,632.22        |
| <b>Subtotal Expenses</b> |                    | <b>\$1,663.59</b> |

**BALANCE DUE** **\$30,737.59**

## **EXHIBIT 3**

# PROJECT CATEGORIES

## with NARRATIVE TASK SUMMARIES

*Consistent with US Trustee Program Guidelines*

TAILORED FOR THE PRESENT CASE

| Code | Category                  |
|------|---------------------------|
| AAR  | ASSET ANALYSIS & RECOVERY |

General Definition: Identification and review of potential assets including causes of action and non-litigation recoveries. Duties Undertaken In This Case: Filed a stipulation for turnover. Investigated the debtor for possible assets and pre-petition and post-petition transfers. Negotiated a settlement regarding vehicles. Filed an adversary proceeding for an avoidable transfer. Necessity and Benefit: Identification and recovery of assets of the estate is integral to the duties of the Trustee and directly benefits the estate and its creditors. Results Obtained: Disputed assets that were liquidated, raising about \$20,000 for the estate.

| Code | Category          |
|------|-------------------|
| AD   | ASSET DISPOSITION |

General Definition: Sales, leases (§ 365 matters), abandonment and related transaction work. Duties Undertaken In This Case: This is a complex case regarding medical receivables, a substantial amount of work, an analysis was performed. Ultimately, the majority of the assets of the estate were disposed of via a motion to sell. Necessity and Benefit: Administration of the Debtor's assets is the primary goal of Chapter 7 bankruptcy proceedings. Court approval is required to abandon, and reject leases prior to statutory deadlines. Results Obtained A \$100,000 sale was consummated (new money to the estate).

| Code | Category                             |
|------|--------------------------------------|
| CAO  | CLAIMS ADMINISTRATION AND OBJECTIONS |

General Definition: Specific claims investigation, inquiries, objections; bar date motions; analysis of claims; objections to claims; estimation of claims; allowances of claims. Duties Undertaken In This Case: Interacted with creditors regarding their proofs of claim. Necessity and Benefit: Finalizing claims, amounts, and categories are required for proper administration of a bankruptcy estate. Results Obtained: The claims that were filed conformed to expectations and documents, so that the estate does not have to undertake any expensive claims objections.

| Code | Category                    |
|------|-----------------------------|
| FEA  | FEE/EMPLOYMENT APPLICATIONS |

General Definition: Preparations of employment and fee application related to the retention of professionals for the Trustee. Duties Undertaken In This Case: Preparation and filing of this application for compensation. Necessity and Benefit: Application for compensation are necessary for estate professionals to be paid. Results Obtained: ALA's application for employment granted. The first and final application for compensation for ALA has been filed (hearing pending).

## **EXHIBIT 4**



**TASK: AAR- Asset Analysis & Recovery**

Page 1 of 8

| Date      | Code | Description   | Person     | Attorney Hours | Attorney Rate | Paralegal Hours | Paralegal Rate | Total     |
|-----------|------|---|------------|----------------|---------------|-----------------|----------------|-----------|
| 28-Sep-21 | AAR  | Analyzed (and discussed with trustee) docs received from creditor                       | Crisostomo | 0.5            | \$ 380.00     |                 |                | \$ 190.00 |
| 5-Oct-21  | AAR  | Researched UCC re: perfection of a security interest in deposit accounts                | Crisostomo | 0.2            | \$ 380.00     |                 |                | \$ 76.00  |
| 5-Oct-21  | AAR  | Drafted stipulation to turnover   | Crisostomo | 0.3            | \$ 380.00     |                 |                | \$ 114.00 |
| 8-Oct-21  | AAR  | Discussed motion to reject the servicing agreement                                      | Crisostomo | 0.3            | \$ 380.00     |                 |                | \$ 114.00 |
| 8-Oct-21  | AAR  | Reviewed and discussed creditor's counsel adversary proceeding against the debtor       | Crisostomo | 0.5            | \$ 380.00     |                 |                | \$ 190.00 |
| 11-Oct-21 | AAR  | Discussion with trustee re status update of bk case & potential assets                  | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 12-Oct-21 | AAR  | Reviewed opposition and motion for relief from automatic stay                           | Crisostomo | 0.2            | \$ 380.00     |                 |                | \$ 76.00  |
| 12-Oct-21 | AAR  | Attended motion for relief from automatic stay  | Crisostomo | 0.7            | \$ 380.00     |                 |                | \$ 266.00 |
| 21-Oct-21 | AAR  | Discussion about Australian creditors, settlement agreement, and possible 547 actions   | Crisostomo | 0.5            | \$ 380.00     |                 |                | \$ 190.00 |
| 22-Oct-21 | AAR  | Emailed foreign creditors re their investments found in debtor's bank statements        | Crisostomo | 0.2            | \$ 380.00     |                 |                | \$ 76.00  |
| 22-Oct-21 | AAR  | Started drafting settlement agreement re debtor's vehicles                              | Crisostomo | 0.4            | \$ 380.00     |                 |                | \$ 152.00 |
| 22-Oct-21 | AAR  | Finished drafting settlement agreement re debtor's vehicles                             | Crisostomo | 0.3            | \$ 380.00     |                 |                | \$ 114.00 |
| 28-Oct-21 | AAR  | Drafted 547/549 AP complaint against Injury Specialists                                 | Crisostomo | 0.9            | \$ 380.00     |                 |                | \$ 342.00 |
| 28-Oct-21 | AAR  | Discussed other 547/549 complaints to draft and the Injury Specialists complaint        | Crisostomo | 0.3            | \$ 380.00     |                 |                | \$ 114.00 |
| 28-Oct-21 | AAR  | Reviewed debtor's bank statements for more complaints to draft                          | Crisostomo | 0.3            | \$ 380.00     |                 |                | \$ 114.00 |
| 29-Oct-21 | AAR  | Analyzed statements and drafted complaint against Kabbage for post petition transfer    | Crisostomo | 0.4            | \$ 380.00     |                 |                | \$ 152.00 |
| 29-Oct-21 | AAR  | Analyzed statements and drafted complaint against Neal Howard for pre-petition transfer | Crisostomo | 0.4            | \$ 380.00     |                 |                | \$ 152.00 |
| 1-Nov-21  | AAR  | Drafted motion to approve stipulation re funds received by estate                       | Crisostomo | 0.4            | \$ 380.00     |                 |                | \$ 152.00 |
| 2-Nov-21  | AAR  | Requested issue of summons re Kabbage AP  | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 3-Nov-21  | AAR  | Served summons service package re Kabbage AP  | Beasley    |                |               | 0.4             | \$ 180.00      | \$ 72.00  |
| 4-Nov-21  | AAR  | Drafted and docketed declaration re motion to compel turnover of dodge ram              | Crisostomo | 0.2            | \$ 380.00     |                 |                | \$ 76.00  |
| 18-Nov-21 | AAR  | Drafted motion to approve settlement re vehicles  | Crisostomo | 0.7            | \$ 380.00     |                 |                | \$ 266.00 |
| 18-Nov-21 | AAR  | Discussed with trustee the settlement agreement re motion to approve settlement         | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 18-Nov-21 | AAR  | Compiled and uploaded 9019 motion to approve settlement                                 | Crisostomo | 0.2            | \$ 380.00     |                 |                | \$ 76.00  |
| 18-Nov-21 | AAR  | Docketed declaration and NOH re 9019 motion to approve settlement                       | Crisostomo | 0.2            | \$ 380.00     |                 |                | \$ 76.00  |
| 18-Nov-21 | AAR  | Discussed motion to sell with trustee and auction procedures                            | Crisostomo | 0.5            | \$ 380.00     |                 |                | \$ 190.00 |
| 18-Nov-21 | AAR  | Recaptioned docs re motion to approve settlement  | Beasley    |                |               | 0.2             | \$ 180.00      | \$ 36.00  |
| 18-Nov-21 | AAR  | Served the NOH re 9019 motion to CMM via COS.com  | Beasley    |                |               | 0.2             | \$ 180.00      | \$ 36.00  |
| 18-Nov-21 | AAR  | Docketed COS re mailing of NOH re 9019 motion   | Beasley    |                |               | 0.1             | \$ 180.00      | \$ 18.00  |
| 19-Nov-21 | AAR  | Revised motion to sell to remove APA and fix auction procedures                         | Crisostomo | 0.7            | \$ 380.00     |                 |                | \$ 266.00 |
| 19-Nov-21 | AAR  | Drafted and docketed NOE for order denying motion of party interest DE 133              | Beasley    |                |               | 0.1             | \$ 180.00      | \$ 18.00  |
| 22-Nov-21 | AAR  | Revised and emailed stip re back account to creditor HASelect                           | Crisostomo | 0.2            | \$ 380.00     |                 |                | \$ 76.00  |
| 22-Nov-21 | AAR  | Discussion with trustee re stipulations and motions to approve stipulations             | Crisostomo | 0.3            | \$ 380.00     |                 |                | \$ 114.00 |
| 22-Nov-21 | AAR  | Drafted stipulation re claims against debtor's principals                               | Crisostomo | 0.3            | \$ 380.00     |                 |                | \$ 114.00 |
| 22-Nov-21 | AAR  | Drafted motion to approve stipulation re bank account balances to creditor HASelect     | Crisostomo | 0.3            | \$ 380.00     |                 |                | \$ 114.00 |
| 22-Nov-21 | AAR  | Drafted NOH re motion to approve stipulation re bank account balances                   | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 22-Nov-21 | AAR  | Drafted motion to approve stipulation re claims against debtor's principals             | Crisostomo | 0.4            | \$ 380.00     |                 |                | \$ 152.00 |
| 22-Nov-21 | AAR  | Drafted NOH re motion to approve stipulation re claims against debtor's principals      | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 22-Nov-21 | AAR  | Drafted order re motion to approve stipulation re bank account balances                 | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 22-Nov-21 | AAR  | Drafted order re motion to approve stipulation re claims against debtor's principals    | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 22-Nov-21 | AAR  | Revised and emailed stip re back account to creditor HASelect                           | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 24-Nov-21 | AAR  | Revised and docketed stipulation re bank account balances                               | Crisostomo | 0.2            | \$ 380.00     |                 |                | \$ 76.00  |
| 24-Nov-21 | AAR  | Drafted and uploaded order approving stipulation re bank account balances               | Crisostomo | 0.2            | \$ 380.00     |                 |                | \$ 76.00  |
| 24-Nov-21 | AAR  | Discussed with trustee further issues re bk case  | Crisostomo | 0.3            | \$ 380.00     |                 |                | \$ 114.00 |
| 24-Nov-21 | AAR  | Reviewed payroll and shareholder loan documents from debtor's counsel                   | Crisostomo | 0.5            | \$ 380.00     |                 |                | \$ 190.00 |
| 24-Nov-21 | AAR  | Emailed HASelect counsel the motion to sell draft, APA, and proposed order              | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 24-Nov-21 | AAR  | Emailed debtor's counsel for business bank statements                                   | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 24-Nov-21 | AAR  | Made changes to stipulation and order re: bank statements                               | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 29-Nov-21 | AAR  | Emailed Kabbage counsel for extension and info re Kabbage AP                            | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 29-Nov-21 | AAR  | Discussed payroll research done on debtor's principals                                  | Crisostomo | 0.3            | \$ 380.00     |                 |                | \$ 114.00 |

**TASK: AAR- Asset Analysis & Recovery**

Page 2 of 8

| Date      | Code | Description   | Person     | Attorney Hours | Attorney Rate | Paralegal Hours | Paralegal Rate | Total     |
|-----------|------|---|------------|----------------|---------------|-----------------|----------------|-----------|
| 29-Nov-21 | AAR  | Draft and docketed NOE for order approving stipulation regarding bank account DE 138    | Beasley    |                |               | 0.1             | \$ 180.00      | \$ 18.00  |
| 1-Dec-21  | AAR  | Phone call and email from debtor's creditor re NOH of motion to approve settlement      | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 9-Dec-21  | AAR  | Drafted and docketed notice of appearance in Tecumseh AP case                           | Crisostomo | 0.2            | \$ 380.00     |                 |                | \$ 76.00  |
| 10-Dec-21 | AAR  | Reviewed payroll of debtor possible 547 actions against debtor's principals             | Crisostomo | 0.5            | \$ 380.00     |                 |                | \$ 190.00 |
| 13-Dec-21 | AAR  | Attended rule 26f conference in Infinity AP   | Crisostomo | 0.4            | \$ 380.00     |                 |                | \$ 152.00 |
| 15-Dec-21 | AAR  | Emailed creditors' counsel re discovery plan in Tecumseh AP                             | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 15-Dec-21 | AAR  | Emailed defendant's counsel re settlement in Kabbage AP                                 | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 15-Dec-21 | AAR  | Phone call with defendant's counsel re Kabbage AP                                       | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 17-Dec-21 | AAR  | Drafted ex parte motion to change defendant re Kabbage AP                               | Crisostomo | 0.5            | \$ 380.00     |                 |                | \$ 190.00 |
| 20-Dec-21 | AAR  | Drafted and docketed NOE for order approving motion to approve settlement DE 160        | Beasley    |                |               | 0.1             | \$ 180.00      | \$ 18.00  |
| 21-Dec-21 | AAR  | Docketed ex parte motion to change defendant's name re Kabbage AP                       | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 21-Dec-21 | AAR  | Finalized and docketed decl re ex parte motion to change defendant's name re Kabbage AP | Crisostomo | 0.2            | \$ 380.00     |                 |                | \$ 76.00  |
| 21-Dec-21 | AAR  | Docketed order granting ex parte motion to change defendant's name re Kabbage AP        | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 22-Dec-21 | AAR  | Drafted and docketed first amended complaint of Kabbage AP with new defendant           | Crisostomo | 0.2            | \$ 380.00     |                 |                | \$ 76.00  |
| 22-Dec-21 | AAR  | Served summons service package on new defendant re Kabbage AP                           | Beasley    |                |               | 0.3             | \$ 180.00      | \$ 54.00  |
| 22-Dec-21 | AAR  | Served and docketed 2nd service summons executed re Kabbage AP                          | Beasley    |                |               | 0.1             | \$ 180.00      | \$ 18.00  |
| 3-Jan-22  | AAR  | Phone call with creditor counsel re motion to sell and selling of claims                | Crisostomo | 0.2            | \$ 420.00     |                 |                | \$ 84.00  |
| 4-Jan-22  | AAR  | Reviewed the Tecumseh amended complaint and defendant's answer to strategize answer     | Crisostomo | 0.4            | \$ 420.00     |                 |                | \$ 168.00 |
| 4-Jan-22  | AAR  | Phone call with attorney for medical lien provider re receivable to Infinity            | Crisostomo | 0.2            | \$ 420.00     |                 |                | \$ 84.00  |
| 4-Jan-22  | AAR  | Started drafting answer to counterclaim re Tecumseh AP                                  | Crisostomo | 0.7            | \$ 420.00     |                 |                | \$ 294.00 |
| 4-Jan-22  | AAR  | Discussed possible counterclaim against Tecumseh in Tecumseh AP                         | Crisostomo | 0.3            | \$ 420.00     |                 |                | \$ 126.00 |
| 5-Jan-22  | AAR  | Discussed with trustee the Tecumseh AP and phone call with creditor counsel             | Crisostomo | 0.8            | \$ 420.00     |                 |                | \$ 336.00 |
| 6-Jan-22  | AAR  | Discussed with trustee Tecumseh AP answer and possible counterclaim re Tecumseh AP      | Crisostomo | 0.8            | \$ 420.00     |                 |                | \$ 336.00 |
| 6-Jan-22  | AAR  | Reviewed cases in preparation for counterclaim re Tecumseh AP                           | Crisostomo | 0.5            | \$ 420.00     |                 |                | \$ 210.00 |
| 6-Jan-22  | AAR  | Emailed defendant counsel instructions for payment re Kabbage AP                        | Crisostomo | 0.2            | \$ 420.00     |                 |                | \$ 84.00  |
| 6-Jan-22  | AAR  | Discussed with trustee court cases in preparation for counterclaim re Tecumseh AP       | Crisostomo | 0.3            | \$ 420.00     |                 |                | \$ 126.00 |
| 6-Jan-22  | AAR  | Started drafting counterclaim re Tecumseh AP  | Crisostomo | 0.9            | \$ 420.00     |                 |                | \$ 378.00 |
| 6-Jan-22  | AAR  | Worked on draft answer and counterclaim (Tecumseh AP)                                   | Crisostomo | 1.3            | \$ 420.00     |                 |                | \$ 546.00 |
| 7-Jan-22  | AAR  | Drafted and sent subpoena to Infinity Health Solutions LLC                              | Crisostomo | 0.3            | \$ 420.00     |                 |                | \$ 126.00 |
| 7-Jan-22  | AAR  | Drafted and docketed notice of intent to subpoena Infinity Health Solutions LLC         | Crisostomo | 0.2            | \$ 420.00     |                 |                | \$ 84.00  |
| 7-Jan-22  | AAR  | Drafted and emailed settlement and release agreement re Kabbage AP                      | Crisostomo | 0.4            | \$ 420.00     |                 |                | \$ 168.00 |
| 7-Jan-22  | AAR  | Reviewed and docketed answer and counterclaim re Kabbage AP                             | Crisostomo | 0.5            | \$ 420.00     |                 |                | \$ 210.00 |
| 7-Jan-22  | AAR  | Worked on AP complaint/counterclaim   | Crisostomo | 1.2            | \$ 420.00     |                 |                | \$ 504.00 |
| 7-Jan-22  | AAR  | More drafting of counterclaim   | Crisostomo | 0.8            | \$ 420.00     |                 |                | \$ 336.00 |
| 10-Jan-22 | AAR  | Reviewed bk docs and drafted counter plaintiff's initial disclosures re Tecumseh AP     | Crisostomo | 0.9            | \$ 420.00     |                 |                | \$ 378.00 |
| 10-Jan-22 | AAR  | Compiled and mailed trustee's initial disclosures re Tecumseh AP                        | Beasley    |                |               | 0.5             | \$ 180.00      | \$ 90.00  |
| 11-Jan-22 | AAR  | Amended and docketed counterclaim to fix caption  | Crisostomo | 0.3            | \$ 420.00     |                 |                | \$ 126.00 |
| 11-Jan-22 | AAR  | Emailed all parties' counsel re new caption re Tecumseh AP                              | Crisostomo | 0.1            | \$ 420.00     |                 |                | \$ 42.00  |
| 12-Jan-22 | AAR  | Drafted acceptance of service of process for tecumseh re Tecumseh AP                    | Crisostomo | 0.2            | \$ 420.00     |                 |                | \$ 84.00  |
| 12-Jan-22 | AAR  | Emailed acceptance of service, counterclaim, and summons to Tecumseh re Tecumseh AP     | Crisostomo | 0.1            | \$ 420.00     |                 |                | \$ 42.00  |
| 12-Jan-22 | AAR  | Reviewed revised settlement agreement re Kabbage AP                                     | Crisostomo | 0.2            | \$ 420.00     |                 |                | \$ 84.00  |
| 12-Jan-22 | AAR  | Drafted electronic deposit authorization form re Kabbage AP                             | Crisostomo | 0.2            | \$ 420.00     |                 |                | \$ 84.00  |
| 12-Jan-22 | AAR  | Emailed settlement agreement and electronic deposit form to defendant re Kabbage AP     | Crisostomo | 0.1            | \$ 420.00     |                 |                | \$ 42.00  |
| 13-Jan-22 | AAR  | Docketed acceptance of service of process re Tecumseh AP                                | Crisostomo | 0.1            | \$ 420.00     |                 |                | \$ 42.00  |
| 21-Jan-22 | AAR  | Discussed with trustee creditor HASelect and the Tecumseh AP                            | Crisostomo | 0.3            | \$ 420.00     |                 |                | \$ 126.00 |
| 24-Jan-22 | AAR  | Phone call with creditor re proof of claim  | Crisostomo | 0.1            | \$ 420.00     |                 |                | \$ 42.00  |
| 25-Jan-22 | AAR  | Emailed defendant about settlement payment re Kabbage AP                                | Crisostomo | 0.1            | \$ 420.00     |                 |                | \$ 42.00  |
| 26-Jan-22 | AAR  | Phone call with creditor re issues with Infinity  | Crisostomo | 0.1            | \$ 420.00     |                 |                | \$ 42.00  |
| 4-Feb-22  | AAR  | Drafted and docketed notice of dismissal of Kabbage AP                                  | Crisostomo | 0.1            | \$ 420.00     |                 |                | \$ 42.00  |
| 7-Feb-22  | AAR  | Discussed meet and confer re subpoena to Infinity Health Solutions                      | Crisostomo | 0.2            | \$ 420.00     |                 |                | \$ 84.00  |

**TASK: AAR- Asset Analysis & Recovery**

Page 3 of 8

| Date      | Code | Description   | Person     | Attorney Hours | Attorney Rate | Paralegal Hours | Paralegal Rate | Total     |
|-----------|------|---|------------|----------------|---------------|-----------------|----------------|-----------|
| 7-Feb-22  | AAR  | Phone call with debtor's creditor re lien reduction to provide info re debtor servicer          | Crisostomo | 0.1            | \$ 420.00     |                 |                | \$ 42.00  |
| 9-Feb-22  | AAR  | Phone call with Infinity Health Solutions counsel re subpoena request                           | Crisostomo | 0.2            | \$ 420.00     |                 |                | \$ 84.00  |
| 9-Feb-22  | AAR  | Phone call with creditor HASelect counsel re subpoena request                                   | Crisostomo | 0.1            | \$ 420.00     |                 |                | \$ 42.00  |
| 10-Feb-22 | AAR  | Drafted ex parte motion to pay admin expense to Infinity Health Solutions LLC                   | Crisostomo | 0.4            | \$ 420.00     |                 |                | \$ 168.00 |
| 15-Feb-22 | AAR  | Docketed ex parte motion to pay admin expense and order   | Crisostomo | 0.2            | \$ 420.00     |                 |                | \$ 84.00  |
| 16-Feb-22 | AAR  | Drafted and docketed NOE for order on ex parte motion DE 187                                    | Beasley    |                |               | 0.1             | \$ 180.00      | \$ 18.00  |
| 18-Feb-22 | AAR  | Emailed Infinity Health Connection's counsel re subpoena production                             | Crisostomo | 0.1            | \$ 420.00     |                 |                | \$ 42.00  |
| 22-Feb-22 | AAR  | Discussed drafting of notice of consummation of sale and motion to substitute parties in AP     | Crisostomo | 0.2            | \$ 420.00     |                 |                | \$ 84.00  |
| 22-Feb-22 | AAR  | Drafted and docketed notice of consummation of sale re Tecumseh AP                              | Crisostomo | 0.2            | \$ 420.00     |                 |                | \$ 84.00  |
| 22-Feb-22 | AAR  | Drafted and docketed notice of consummation of sale in main case re Tecumseh AP                 | Crisostomo | 0.2            | \$ 420.00     |                 |                | \$ 84.00  |
| 22-Feb-22 | AAR  | Drafted ex parte motion to substitute parties in Tecumseh AP                                    | Crisostomo | 0.6            | \$ 420.00     |                 |                | \$ 252.00 |
| 22-Feb-22 | AAR  | Drafted order of amended complaint re motion to substitute parties in Tecumseh AP               | Crisostomo | 0.2            | \$ 420.00     |                 |                | \$ 84.00  |
| 22-Feb-22 | AAR  | Discussion with trustee and creditor HASelect re stipulation to substitute party re Tecumseh AP | Crisostomo | 0.2            | \$ 420.00     |                 |                | \$ 84.00  |
| 22-Feb-22 | AAR  | Drafted stipulation to substitute party re Tecumseh AP  | Crisostomo | 0.5            | \$ 420.00     |                 |                | \$ 210.00 |
| 22-Feb-22 | AAR  | Emailed defendant's counsel re discovery plan re Tecumseh AP                                    | Crisostomo | 0.1            | \$ 420.00     |                 |                | \$ 42.00  |
| 25-Feb-22 | AAR  | Drafted motion to substitute party and recaption case re Tecumseh AP                            | Crisostomo | 0.6            | \$ 420.00     |                 |                | \$ 252.00 |
| 28-Feb-22 | AAR  | Revised motion to substitute party and NOH re Tecumseh AP                                       | Crisostomo | 0.7            | \$ 420.00     |                 |                | \$ 294.00 |
| 28-Feb-22 | AAR  | Docketed motion to substitute party, NOH, and COS re Tecumseh AP                                | Crisostomo | 0.2            | \$ 420.00     |                 |                | \$ 84.00  |
| 28-Feb-22 | AAR  | Recaptioned order, NOE, and COS re motion to substitute party re Tecumseh AP                    | Beasley    |                |               | 0.1             | \$ 180.00      | \$ 18.00  |
| 2-Mar-22  | AAR  | Phone call with creditor re POC filed in bk   | Crisostomo | 0.2            | \$ 420.00     |                 |                | \$ 84.00  |
| 3-Mar-22  | AAR  | Received and reviewed subpoena response from Infinity Health Solutions                          | Crisostomo | 0.6            | \$ 420.00     |                 |                | \$ 252.00 |
| 22-Mar-22 | AAR  | Attended scheduling conference of Tecumseh AP   | Crisostomo | 0.2            | \$ 420.00     |                 |                | \$ 84.00  |
| 23-Mar-22 | AAR  | Discussed opposition to motion to substitute re Tecumseh AP                                     | Crisostomo | 0.3            | \$ 420.00     |                 |                | \$ 126.00 |
| 23-Mar-22 | AAR  | Researched case law re reply to opposition to motion to substitute re Tecumseh AP               | Crisostomo | 0.9            | \$ 420.00     |                 |                | \$ 378.00 |
| 23-Mar-22 | AAR  | Started drafting reply to opposition to motion to substitute re Tecumseh AP                     | Crisostomo | 0.9            | \$ 420.00     |                 |                | \$ 378.00 |
| 23-Mar-22 | AAR  | Continued to draft reply to opposition to motion to substitute re Tecumseh AP                   | Crisostomo | 0.7            | \$ 420.00     |                 |                | \$ 294.00 |
| 23-Mar-22 | AAR  | Reviewed motion to dismiss and partial motion for summary judgment re Tecumseh AP               | Crisostomo | 0.3            | \$ 420.00     |                 |                | \$ 126.00 |
| 24-Mar-22 | AAR  | Discussed motion to dismiss, motion for summary judgment, and reply re Tecumseh AP              | Crisostomo | 0.5            | \$ 420.00     |                 |                | \$ 210.00 |
| 24-Mar-22 | AAR  | Continued case law research and drafting of reply to limited opp to substitute re Tecumseh AP   | Crisostomo | 0.9            | \$ 420.00     |                 |                | \$ 378.00 |
| 24-Mar-22 | AAR  | Continued drafting of reply to limited opp to substitute re Tecumseh AP                         | Crisostomo | 0.9            | \$ 420.00     |                 |                | \$ 378.00 |
| 29-Mar-22 | AAR  | Discussed first draft of reply to opp to motion to substitute re Tecumseh AP                    | Crisostomo | 0.2            | \$ 420.00     |                 |                | \$ 84.00  |
| 29-Mar-22 | AAR  | Reviewed case law research from HASelect counsel re motion to dismiss re Tecumseh AP            | Crisostomo | 0.6            | \$ 420.00     |                 |                | \$ 252.00 |
| 29-Mar-22 | AAR  | Researched case law regarding reply to opp to motion to substitute re Tecumseh AP               | Crisostomo | 0.9            | \$ 420.00     |                 |                | \$ 378.00 |
| 29-Mar-22 | AAR  | Continued to research case law regarding reply to opp to motion to substitute re Tecumseh AP    | Crisostomo | 0.4            | \$ 420.00     |                 |                | \$ 168.00 |
| 29-Mar-22 | AAR  | Revised first section of reply to opp to motion to substitute re Tecumseh AP                    | Crisostomo | 0.7            | \$ 420.00     |                 |                | \$ 294.00 |
| 29-Apr-22 | AAR  | Discussed opposition in Infinity AP and phone call with HASelect counsel                        | Crisostomo | 0.5            | \$ 420.00     |                 |                | \$ 210.00 |
| 13-May-22 | AAR  | Continued reviewing subpoena response from Chase Bank   | Crisostomo | 0.3            | \$ 420.00     |                 |                | \$ 126.00 |
| 13-May-22 | AAR  | Discussed with Trustee developments in Tecumseh AP  | Crisostomo | 0.1            | \$ 420.00     |                 |                | \$ 42.00  |
| 16-May-22 | AAR  | Discussed potential settlement and sale of assets to HASelect                                   | Crisostomo | 0.1            | \$ 420.00     |                 |                | \$ 42.00  |
| 17-May-22 | AAR  | Started drafting settlement and sale agreement with HASelect                                    | Crisostomo | 0.6            | \$ 420.00     |                 |                | \$ 252.00 |
| 18-May-22 | AAR  | Continued drafting settlement and sale agreement to HASelect                                    | Crisostomo | 0.4            | \$ 420.00     |                 |                | \$ 168.00 |
| 18-May-22 | AAR  | Phone call with HASelect counsel re settlement and sale agreement                               | Crisostomo | 0.2            | \$ 420.00     |                 |                | \$ 84.00  |
| 23-May-22 | AAR  | Drafted and docket NOE for order granting motion to substitute DE 81                            | Beasley    |                |               | 0.1             | \$ 180.00      | \$ 18.00  |
| 7-Jun-22  | AAR  | Reviewed HASelect letter and potential complaint against debtor                                 | Crisostomo | 0.3            | \$ 420.00     |                 |                | \$ 126.00 |
| 7-Jun-22  | AAR  | Phone call with HASelect re letter and potential complaint against debtor                       | Crisostomo | 0.2            | \$ 420.00     |                 |                | \$ 84.00  |
| 9-Jun-22  | AAR  | Finished drafting settlement & sale agreement with HASelect                                     | Crisostomo | 0.6            | \$ 420.00     |                 |                | \$ 252.00 |
| 29-Jun-22 | AAR  | Emailed injury specialist client re contacting debtor's server                                  | Crisostomo | 0.1            | \$ 420.00     |                 |                | \$ 42.00  |
| 11-Jul-22 | AAR  | Reviewed all POCs for possible objections to POC  | Crisostomo | 0.8            | \$ 420.00     |                 |                | \$ 336.00 |
| 11-Jul-22 | AAR  | Discussion with trustee re 2 POC objections   | Crisostomo | 0.3            | \$ 420.00     |                 |                | \$ 126.00 |
| 11-Jul-22 | AAR  | Drafted and docketed objection to POC 5 and NOH   | Crisostomo | 0.6            | \$ 420.00     |                 |                | \$ 252.00 |

**TASK: AAR- Asset Analysis & Recovery**

Page 4 of 8

| Date   | Code | Description   | Person     | Attorney Hours | Attorney Rate | Paralegal Hours | Paralegal Rate | Total               |
|--|------|---|------------|----------------|---------------|-----------------|----------------|---------------------|
| 11-Jul-22  | AAR  | Drafted and docketed objection to POC 6 and NOH   | Crisostomo | 0.5            | \$ 420.00     |                 |                | \$ 210.00           |
| 11-Jul-22  | AAR  | Served objection to POC 5 and NOH to creditor   | Beasley    |                |               | 0.2             | \$ 180.00      | \$ 36.00            |
| 11-Jul-22  | AAR  | Served objection to POC 6 and NOH to creditor   | Beasley    |                |               | 0.2             | \$ 180.00      | \$ 36.00            |
| 11-Jul-22  | AAR  | Drafted and docketed COS for NOH DE 228 - 231   | Beasley    |                |               | 0.1             | \$ 180.00      | \$ 18.00            |
| 11-Aug-22  | AAR  | Edits to draft settlement sale agreement  | Crisostomo | 0.6            | \$ 420.00     |                 |                | \$ 252.00           |
| 11-Aug-22  | AAR  | Drafted and docketed order approving objection to POC 6                                 | Beasley    |                |               | 0.1             | \$ 180.00      | \$ 18.00            |
| 16-Aug-22  | AAR  | Drafted and docketed NOE for order sustaining trustee's objection to claim no. 6 DE 238 | Beasley    |                |               | 0.1             | \$ 180.00      | \$ 18.00            |
| 16-Aug-22  | AAR  | Served via US mail NOE DE 239 then drrafted and docketed COS                            | Beasley    |                |               | 0.1             | \$ 180.00      | \$ 18.00            |
| 29-Aug-22  | AAR  | Drafted and docketed NEO [DE 249] and COS [DE 250] + served NEO to creditor             | Beasley    |                |               | 0.2             | \$ 180.00      | \$ 36.00            |
| 30-Aug-22  | AAR  | Drafted and docketed NEO for order on ex parte app for comp for accountant 251          | Beasley    |                |               | 0.1             | \$ 180.00      | \$ 18.00            |
| <b>Total - AAR (ASSET ANALYSIS &amp; RECOVERY)</b> |      |   |            | <b>49.4</b>    |               | <b>3.5</b>      |                | <b>\$ 20,734.00</b> |

**TASK: AD - Asset Disposition**

Page 5 of 8

| Date      | Code | Description  | Person     | Attorney Hours | Attorney Rate | Paralegal Hours | Paralegal Rate | Total     |
|-----------|------|--|------------|----------------|---------------|-----------------|----------------|-----------|
| 12-Oct-21 | AD   | Reviewed opposition and motion to approve abandonment of collateral                              | Crisostomo | 0.2            | \$ 380.00     |                 |                | \$ 76.00  |
| 12-Oct-21 | AD   | Attended motion to approve abandonment   | Crisostomo | 0.4            | \$ 380.00     |                 |                | \$ 152.00 |
| 13-Oct-21 | AD   | Reviewed orders granting motion for relief from stay and granting joint motion for abandonment   | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 1-Nov-21  | AD   | Discussed with trustee drafting of motion to sell non-abandoned receivables                      | Crisostomo | 0.3            | \$ 380.00     |                 |                | \$ 114.00 |
| 1-Nov-21  | AD   | Drafted motion to sell non-abandoned receivables   | Crisostomo | 0.7            | \$ 380.00     |                 |                | \$ 266.00 |
| 1-Nov-21  | AD   | Recaptioned documents re motion to sell non-abandoned receivables                                | Beasley    |                |               | 0.1             | \$ 180.00      | \$ 18.00  |
| 3-Nov-21  | AD   | Strategized with trustee opposition to Tecumseh's motion to abandon property                     | Crisostomo | 0.2            | \$ 380.00     |                 |                | \$ 76.00  |
| 3-Nov-21  | AD   | Drafted and docketed opposition to Tecumseh's motion to abandon property                         | Crisostomo | 0.6            | \$ 380.00     |                 |                | \$ 228.00 |
| 4-Nov-21  | AD   | Revised motion to sell non-abandoned receivables after receiving new info                        | Crisostomo | 0.3            | \$ 380.00     |                 |                | \$ 114.00 |
| 5-Nov-21  | AD   | Drafted notice of surrender of facility  | Crisostomo | 0.3            | \$ 380.00     |                 |                | \$ 114.00 |
| 5-Nov-21  | AD   | Drafted OST motion, decl, and attorney info sheet re motion to sell disputed receivables         | Crisostomo | 0.4            | \$ 380.00     |                 |                | \$ 152.00 |
| 16-Nov-21 | AD   | Added procedures section to motion to sell receivables   | Crisostomo | 0.3            | \$ 380.00     |                 |                | \$ 114.00 |
| 17-Nov-21 | AD   | Drafted APA re sale of receivables to creditor HASelect  | Crisostomo | 0.5            | \$ 380.00     |                 |                | \$ 190.00 |
| 17-Nov-21 | AD   | Revised motion to sell receivables with addition of APA to creditor HASelect                     | Crisostomo | 0.6            | \$ 380.00     |                 |                | \$ 228.00 |
| 17-Nov-21 | AD   | Emailed creditors draft proposed order denying motion to abandon and lift stay                   | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 17-Nov-21 | AD   | Emailed creditors re: motion to sell on shortened time   | Crisostomo | 0.2            | \$ 380.00     |                 |                | \$ 76.00  |
| 17-Nov-21 | AD   | Worked on draft of APA   | Crisostomo | 0.8            | \$ 380.00     |                 |                | \$ 304.00 |
| 17-Nov-21 | AD   | More drafting of APA   | Crisostomo | 0.5            | \$ 380.00     |                 |                | \$ 190.00 |
| 18-Nov-21 | AD   | Finalized and uploaded order denying Tecumseh's motion to abandon receivables                    | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 19-Nov-21 | AD   | Revised OST motion and declaration re motion to sell   | Crisostomo | 0.5            | \$ 380.00     |                 |                | \$ 190.00 |
| 22-Nov-21 | AD   | Phone call with trustee and creditor HASelect re motion to sell                                  | Crisostomo | 0.2            | \$ 380.00     |                 |                | \$ 76.00  |
| 22-Nov-21 | AD   | Emailed revised asset purchase agreement to creditor HASelect                                    | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 23-Nov-21 | AD   | Revised motion to sell to match revised APA with HASelect  | Crisostomo | 0.5            | \$ 380.00     |                 |                | \$ 190.00 |
| 23-Nov-21 | AD   | Revised proposed order granting motion to sell   | Crisostomo | 0.2            | \$ 380.00     |                 |                | \$ 76.00  |
| 23-Nov-21 | AD   | Revised motion for OST re motion to sell   | Crisostomo | 0.3            | \$ 380.00     |                 |                | \$ 114.00 |
| 24-Nov-21 | AD   | Phone call with trustee and HASelect re motion to sell and other 547 causes of action            | Crisostomo | 0.3            | \$ 380.00     |                 |                | \$ 114.00 |
| 24-Nov-21 | AD   | Continued working on next draft of motion to sell  | Crisostomo | 0.7            | \$ 380.00     |                 |                | \$ 266.00 |
| 29-Nov-21 | AD   | Drafted decl re motion to sell receivables   | Crisostomo | 0.2            | \$ 380.00     |                 |                | \$ 76.00  |
| 1-Dec-21  | AD   | Phone call with trustee and creditor HASelect re revisions to motion to sell                     | Crisostomo | 0.2            | \$ 380.00     |                 |                | \$ 76.00  |
| 3-Dec-21  | AD   | Finalized, compiled, and docketed motion to sell assets  | Crisostomo | 0.4            | \$ 380.00     |                 |                | \$ 152.00 |
| 3-Dec-21  | AD   | Finalized and docketed decl re motion to sell assets   | Crisostomo | 0.2            | \$ 380.00     |                 |                | \$ 76.00  |
| 3-Dec-21  | AD   | Revised OST motion and decl re motion to sell assets   | Crisostomo | 0.3            | \$ 380.00     |                 |                | \$ 114.00 |
| 3-Dec-21  | AD   | Finalized and docketed ost motion re motion to sell assets                                       | Crisostomo | 0.3            | \$ 380.00     |                 |                | \$ 114.00 |
| 3-Dec-21  | AD   | Finalized and docketed decl re ost motion re motion to sell assets                               | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 3-Dec-21  | AD   | Docketed attorney info sheet re ost motion re motion to sell assets                              | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 3-Dec-21  | AD   | Uploaded order on ost motion re motion to sell assets  | Crisostomo | 0.1            | \$ 380.00     |                 |                | \$ 38.00  |
| 7-Dec-21  | AD   | Drafted, compiled, and uploaded Notice of Hearing and Notice of Entry of OST (re Motion to Sell) | Beasley    |                |               | 0.2             | \$ 180.00      | \$ 36.00  |
| 8-Dec-21  | AD   | Served motion to sell and NOH to CMM via COS.com   | Beasley    |                |               | 0.2             | \$ 180.00      | \$ 36.00  |
| 14-Dec-21 | AD   | Analyzed opposition to motion to sell and started case law research                              | Crisostomo | 0.9            | \$ 380.00     |                 |                | \$ 342.00 |
| 14-Dec-21 | AD   | Continued case law research in preparation for reply to opp to motion to sell                    | Crisostomo | 0.9            | \$ 380.00     |                 |                | \$ 342.00 |
| 14-Dec-21 | AD   | Discussed case law findings re reply to opposition to motion to sell                             | Crisostomo | 0.2            | \$ 380.00     |                 |                | \$ 76.00  |
| 15-Dec-21 | AD   | Finished researching case law re reply to opp to motion to sell                                  | Crisostomo | 0.7            | \$ 380.00     |                 |                | \$ 266.00 |
| 15-Dec-21 | AD   | Discussed other case law research re reply to opp to motion to sell                              | Crisostomo | 0.2            | \$ 380.00     |                 |                | \$ 76.00  |
| 15-Dec-21 | AD   | Prepared and draft section of reply to opp to motion to sell                                     | Crisostomo | 0.9            | \$ 380.00     |                 |                | \$ 342.00 |
| 15-Dec-21 | AD   | Continued to draft section of reply to opp to motion to sell                                     | Crisostomo | 0.9            | \$ 380.00     |                 |                | \$ 342.00 |
| 15-Dec-21 | AD   | More drafting and edits to reply to opp to motion to sell  | Crisostomo | 0.7            | \$ 380.00     |                 |                | \$ 266.00 |
| 16-Dec-21 | AD   | Finished drafting and editing section of reply to opp to motion to sell                          | Crisostomo | 0.9            | \$ 380.00     |                 |                | \$ 342.00 |
| 20-Dec-21 | AD   | Researched additional case law re reply to opp to motion to sell                                 | Crisostomo | 0.6            | \$ 380.00     |                 |                | \$ 228.00 |
| 20-Dec-21 | AD   | Finished and docketed reply and decl to opp to motion to sell                                    | Crisostomo | 0.2            | \$ 380.00     |                 |                | \$ 76.00  |
| 21-Jan-22 | AD   | Drafted and docketed NEO for order on motion to sell   | Beasley    |                |               | 0.1             | \$ 180.00      | \$ 18.00  |

**TASK: AD - Asset Disposition**

Page 6 of 8

| Date                           | Code | Description   | Person     | Attorney<br>Hours | Attorney<br>Rate | Paralegal<br>Hours | Paralegal<br>Rate | Total       |
|--------------------------------|------|---|------------|-------------------|------------------|--------------------|-------------------|-------------|
| 8-Feb-22                       | AD   | Reviewed order and opposition to motion to sell re account receivables                          | Crisostomo | 0.2               | \$ 420.00        |                    |                   | \$ 84.00    |
| 8-Feb-22                       | AD   | Discussed auction hearing of motion to sell re account receivables and phone call with HASElect | Crisostomo | 0.3               | \$ 420.00        |                    |                   | \$ 126.00   |
| 8-Feb-22                       | AD   | Drafted stip and order re auction purchase price  | Crisostomo | 0.3               | \$ 420.00        |                    |                   | \$ 126.00   |
| 11-Feb-22                      | AD   | Drafted and docketed Notice of Entry of Order (re: order approving sale)                        | Beasley    |                   |                  | 0.1                | \$ 180.00         | \$ 18.00    |
| 7-Jun-22                       | AD   | Discussion re selling other claims to HASElect and PSA  | Crisostomo | 0.2               | \$ 420.00        |                    |                   | \$ 84.00    |
| Total - AD (ASSET DISPOSITION) |      |   |            | 19.4              |                  | 0.7                |                   | \$ 7,538.00 |

**TASK: CAO - Claims Admin & Objections**

Page 7 of 8

| Date  | Code | Description  | Person     | Attorney<br>Hours | Attorney<br>Rate | Paralegal<br>Hours | Paralegal<br>Rate | Total            |
|---|------|--|------------|-------------------|------------------|--------------------|-------------------|------------------|
| 21-Oct-21   | CAO  | Emailed Australian creditors of debtor how to file POCs        | Crisostomo | 0.2               | \$ 380.00        |                    |                   | \$ 76.00         |
| 22-Oct-21   | CAO  | Discussed new POCs and settlement re vehicle                   | Crisostomo | 0.2               | \$ 380.00        |                    |                   | \$ 76.00         |
| 27-Oct-21   | CAO  | Emailed creditor regarding next steps after filing POC         | Crisostomo | 0.1               | \$ 380.00        |                    |                   | \$ 38.00         |
| 28-Oct-21   | CAO  | Discussed about emailing creditors answering questions re POCs | Crisostomo | 0.3               | \$ 380.00        |                    |                   | \$ 114.00        |
| 3-Jan-22  | CAO  | Phone call with creditor re filing a proof of claim            | Crisostomo | 0.2               | \$ 420.00        |                    |                   | \$ 84.00         |
| <b>Total - CAO (CLAIMS ADMINISTRATION &amp; OBJECTIONS)</b> |      |  |            | <b>1.0</b>        |                  | <b>0.0</b>         |                   | <b>\$ 388.00</b> |

**TASK: FEA - Fee-Emp Applications**

Page 8 of 8

| Date   | Code | Description   | Person  | Attorney Hours | Attorney Rate | Paralegal Hours | Paralegal Rate | Total            |
|--|------|---|---------|----------------|---------------|-----------------|----------------|------------------|
| 17-Oct-22  | FEA  | Worked on Exhibit 5 for Fee Application                     | Beasley |                |               | 0.2             | \$ 180.00      | \$ 36.00         |
| 18-Oct-22  | FEA  | Sorted and reviewed time entries for fee app                | Beasley |                |               | 0.6             | \$ 180.00      | \$ 108.00        |
| 20-Oct-22  | FEA  | Drafting of fee application and exhibits                    | Beasley |                |               | 0.8             | \$ 180.00      | \$ 144.00        |
| 22-Oct-22  | FEA  | Revised and finalized all exhibits for fee app              | Beasley |                |               | 0.4             | \$ 180.00      | \$ 72.00         |
| TBD  | FEA  | Compiled and uploaded fee application; draft and upload NOH | Beasley |                |               | 0.3             | \$ 180.00      | \$ 54.00         |
| <b>Total - FEA (FEE &amp; EMPLOYMENT APPLICATIONS)</b> |      |   |         | <b>0.0</b>     |               | <b>2.3</b>      |                | <b>\$ 414.00</b> |



## **EXHIBIT 5**

**EXPENSE DETAIL****PRINTING**

|    |      |
|----|------|
| \$ | 0.25 |
|----|------|

*Print cost per page*

| <b>Date Incurred</b>     | <b>Type</b> | <b>Total</b>    | <b>Description</b>  | <b># of Sets Printed</b> | <b>Pages per Set</b> |
|--------------------------|-------------|-----------------|---|--------------------------|----------------------|
| 11/3/21                  | Print       | \$ 5.00         | Printing for mailing of summons service package (Kabbage AP)        | 2                        | 10                   |
| 12/22/21                 | Print       | \$ 2.50         | Printing for 2nd mailing of summons service package (Kabbage AP)    | 1                        | 10                   |
| 1/10/22                  | Print       | \$ 3.75         | Printing for mailing of trustee's initial disclosures (Tecumseh AP) | 3                        | 5                    |
| 7/11/22                  | Print       | \$ 2.75         | Printing for objection to POC 5 and NOH to creditor                 | 1                        | 11                   |
| 7/11/22                  | Print       | \$ 7.00         | Printing for objection to POC 6 and NOH to creditor                 | 1                        | 28                   |
| 8/16/22                  | Print       | \$ 0.50         | Printing for NOE DE 239 to creditor                                 | 1                        | 2                    |
| <b>SUBTOTAL PRINTING</b> |             | <b>\$ 21.50</b> |   |                          |                      |

**POSTAGE**

| <b>Date Incurred</b>    | <b>Type</b> | <b>Total</b>   | <b>Description</b>   |
|-------------------------|-------------|----------------|--|
| 11/3/21                 | US Mail     | \$ 3.12        | Postage for mailing of summons service package (Kabbage AP)        |
| 12/22/21                | US Mail     | \$ 1.56        | Postage for 2nd mailing of summons service package (Kabbage AP)    |
| 1/10/22                 | US Mail     | \$ 2.19        | Postage for mailing of trustee's initial disclosures (Tecumseh AP) |
| 7/11/22                 | US Mail     | \$ 0.81        | Postage for mailing of objection to POC 5 and NOH to creditor      |
| 7/11/22                 | US Mail     | \$ 1.05        | Postage for mailing of objection to POC 5 and NOH to creditor      |
| 8/16/22                 | US Mail     | \$ 0.57        | Postage for mailing of NOE 239 to creditor                         |
| 8/29/22                 | US Mail     | \$ 0.57        | Postage for mailing of NOE 249 to creditor                         |
| <b>SUBTOTAL POSTAGE</b> |             | <b>\$ 9.87</b> |  |

**THIRD-PARTY EXPENSES**

| <b>Date Incurred</b>        | <b>Type</b> | <b>Total</b>       | <b>Description</b>   |
|-----------------------------|-------------|--------------------|--|
| 9/29/21                     | 3P          | \$ 35.33           | Print/mail of NOH [DE 40] for app to employ (sent via www.COS.com)                 |
| 11/18/21                    | 3P          | \$ 199.37          | Print/mail of NOH [DE 130] for motion to approve settlement (sent via www.COS.com) |
| 12/8/21                     | 3P          | \$ 1,133.85        | Print/mail of NOH [DE 151] for motion to sell (sent via www.COS.com)               |
| 2/17/22                     | 3P          | \$ 54.00           | Process server fee for subpoena to Infinity Health Solutions                       |
| TBD                         | 3P          | \$ 209.67          | Print/mail of NOH for fee app (sent via www.COS.com)                               |
| <b>SUBTOTAL THIRD-PARTY</b> |             | <b>\$ 1,632.22</b> |  |

**TOTAL EXPENSES (by category)**

|                       |                    |
|-----------------------|--------------------|
| Printing              | \$ 21.50           |
| Postage               | \$ 9.87            |
| Third-Party           | \$ 1,632.22        |
| <b>TOTAL EXPENSES</b> | <b>\$ 1,663.59</b> |

## **EXHIBIT 6**

**CLIENT REVIEW STATEMENT**

**Robert E. Atkinson** hereby declares and verifies:

1. That I am the chapter 7 trustee for the bankruptcy estate of INFINITY CAPITAL MANAGEMENT, INC. DBA INFINITY HEATH CONNECTIONS, Nevada bankruptcy case 21-14486-ABL;
2. That I understand that this statement is to be used as an exhibit in Atkinson Law Associates Ltd.'s ("ALA") first and final application for fees and expenses, spanning the time period from September 28, 2021 through October 17, 2022, inclusively (the "Application Period");
3. That I interacted with ALA on a regular basis during the Application Period, and so my assessment contained in this statement is based on my personal knowledge;
4. That I have reviewed the time detail (Exhibit 4) and expenses (Exhibit 5) in the foregoing application, and also the Summary Sheet (Exhibit 1) and Summary Invoice (Exhibit 2);
5. That, in my judgment, the time spent and expenses incurred by ALA during the Application Period was for work reasonably likely and necessary for the benefit of the bankruptcy estate at the time it was incurred, and necessary for the administration of the estate.
6. The services were performed by ALA within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed.
7. That ALA's attorney is an experienced professional person who, in my opinion, has demonstrated significant skill and experience in the bankruptcy field.
8. That, in my experience and judgment, the compensation sought by ALA (inclusive of time spent and rate structure) is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.
9. That I have no objection to any of the time detail, fees, expenses, or the total amounts sought by ALA in its application.



ROBERT E. ATKINSON, Trustee